

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts



Division

Abdullah Saajoh Sall

Case No.

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Chittenden County Townships, Chittenden County State Attorney's Office, Chittenden Police Departments, Seven Day, City of Burlington, YMCA,

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one)  Yes  No

FILED  
IN CLERKS OFFICE  
2020 NOV 12 AM 11: 33  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

|                  |                       |       |          |
|------------------|-----------------------|-------|----------|
| Name             | Abdullah Sall         |       |          |
| Address          | 6910 Salzburger Ave   |       |          |
|                  | St. Louis             | MO    | 63116    |
| County           | City                  | State | Zip Code |
| Telephone Number | St. Louis City County |       |          |
| E-Mail Address   | 802 324 6941          |       |          |
|                  | pullofuta1@gmail.com  |       |          |

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

|                                    |  |       |          |
|------------------------------------|--|-------|----------|
| Name                               | Sarah Fair George  |       |          |
| Job or Title ( <i>if known</i> )   | Chittenden County State Attorney and Chittenden County Sheriff |       |          |
| Address                            | 32 Cherry St #305  |       |          |
|                                    | Burlington   | VT    | 05401    |
| County                             | City   | State | Zip Code |
| Telephone Number                   |  |       |          |
| E-Mail Address ( <i>if known</i> ) | 802863 2865  |       |          |

Individual capacity    Official capacity

**Defendant No. 2**

|                                    |                         |       |          |
|------------------------------------|-------------------------|-------|----------|
| Name                               | Da Capo Publishing Inc. |       |          |
| Job or Title ( <i>if known</i> )   | Publishing              |       |          |
| Address                            | 255 South Champlain St  |       |          |
|                                    | Burlington              | VT    | 05401    |
| County                             | City                    | State | Zip Code |
| Telephone Number                   | 802 864 5684            |       |          |
| E-Mail Address ( <i>if known</i> ) |                         |       |          |

Individual capacity    Official capacity

**Defendant No. 3**

|  |   |              |                 |
|--|---|--------------|-----------------|
| Name   | Chittenden County Police Departments and Vermont State Police |              |                 |
| Job or Title ( <i>if known</i> )   | Law Enforcement   |              |                 |
| Address  | 45 State Drive  |              |                 |
|  | Waterbury   | VT           | 05671           |
| County   | <i>City</i>   | <i>State</i> | <i>Zip Code</i> |
| Telephone Number   | 802 244 7345  |              |                 |
| E-Mail Address ( <i>if known</i> )   |   |              |                 |
| <input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity |   |              |                 |

**Defendant No. 4**

|  |  |              |                 |
|--|--|--------------|-----------------|
| Name   | City of Burlington and Chittenden County |              |                 |
| Job or Title ( <i>if known</i> )   |  |              |                 |
| Address  | 149 Church Street                        |              |                 |
|  | Burlington                               | VT           | 05401           |
| County   | <i>City</i>                              | <i>State</i> | <i>Zip Code</i> |
| Telephone Number   | 802 865 7000                             |              |                 |
| E-Mail Address ( <i>if known</i> )   |  |              |                 |
| <input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity |  |              |                 |

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

**A. Are you bringing suit against (*check all that apply*):**

- Federal officials (a *Bivens* claim)  
 State or local officials (a § 1983 claim)

**B.** Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? Discrimination based on race, discrimination based on religion, discrimination based on national origin, Election Sabotage, Defamation of Character, racial profiling, Aversive hostilities, religious persecution, ethnic persecution, Insurance benefits tampering and so on.**C.** Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

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- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
- Section 1983.
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### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?  
In Chittenden County, Vermont
- 

- B. What date and approximate time did the events giving rise to your claim(s) occur?  
2012 to present
- 

- C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)  
Please see attached documents / written statement.
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#### IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Chronic trauma, depression, anxiety, and so on. Please see attached written statement for details.

Please see attached document

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#### V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I am seeking redress and restitution from the United States Court for Crimes of racial discrimination, religious discrimination and persecution, discrimination based on national origin, and ethnic persecution, defamation of character, racial profiling, Election Sabotage or Electoral meddling, attempted entrapment, denial of insurance benefits, aversive hostilities and excessive retaliation. I am filing this lawsuit against the Chittenden State Attorney ' s Office and Chittenden County Sheriff, City of Burlington and Chittenden County, Chittenden County Police Departments and Vermont State Police, Greater Burlington YMCA, State of Vermont, and Seven Days Inc. I am seeking a prayer of relief in the amount of \$300 million dollars in restitution, which is a modest amount for the entire state given how much they spend on restitution. This amount of prayer of relief meet the criteria of infrequent amount \$, deterrence \$, and punishment \$. This prayer of relief will help adjust all the injustices I was made to endure. They had hope, I go away by suicide and I came close many times, but I realized it will make those who racially torment me to live comfortably. It will also, make them brave to find another victim to torment. They will get away with the crimes they have committed over the years against me.

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## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/3/2020

Signature of Plaintiff Abdullah Sall

Printed Name of Plaintiff ABDULLAH S. SALL



### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

*City*

*State*

*Zip Code*

Telephone Number 802 324 6941

E-mail Address pullofuta1@gmail.com